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UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON

KELLI GRAY, and all other similarly
situated,

Plaintiff,

v.

SUTTELL & ASSOCIATES;
MIDLAND FUNDING, LLC; MARK
T. CASE, and JANE DOE CASE,
husband and wife, KAREN HAMMER
and JOHN DOE HAMMER

Defendants.

Case No.: CV-09-251-EFS

MOTION TO COMPEL
PRODUCTION OF DOCUMENTS
AND RESPONSES TO
INTERROGATORIES FROM
DEFENDANTS SUTTELL &
ASSOCIATES

Plaintiff Kelli Gray, through her attorney Kirk D. Miller of Kirk D. Miller,
P.S., requests that the Court enter an Order compelling Defendant Suttell &

MOTION TO COMPEL DISCOVERY

1 Associates to produce documents in Response to Plaintiff's Second Set of Requests
2 for Production and Second Set of Interrogatories that were served on this
3 Defendant on June 1, 2010 and June 16, 2010, respectively.
4

5 The Plaintiff requests attorney fees and costs pursuant to FRCP 37(a)(4)(A).

6 This motion is based on Fed R. Civ. P. 26, 33, 34 & 37, the Memorandum in
7 Support of Plaintiff's Motion to Compel, the Declaration of Kirk D. Miller in
8 Support of Motion to Compel, and the files and pleadings herein.
9

10 I certify that I have in good faith conferred with Carl Heuber of Winston &
11 Cashatt., the attorney for the Defendants Suttell & Associates, Mark T. Case, Jane
12 Doe Case, Karen Hammer, and John Doe Hammer in an effort to secure the
13 discovery disclosures without court action.
14

15 Dated this the 10th day of August, 2010
16

17 *Kirk D. Miller, P.S.*
18

19 /s/ Kirk D. Miller

20 Kirk D. Miller
21 Attorney for Plaintiff
22 WSBA # 40025
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25

CM/ECF CERTIFICATE OF SERVICE

I hereby certify that on the 10th day of August, 2010, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following:

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